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April 29, 2015

VIA ECF AND FACSIMILE

Hon. Frank Mass
Chief U.S. Magistrate Judge
United States District Court for the
Southern District of New York
500 Pearl Street, Courtroom 20A
New York, NY 10007-1312

**Re: *Kriss et al. v. Bayrock Group LLC et al.*, 10 Civ. 03959 (LGS) (FM)
Kriss et al. v. Bayrock Group LLC et al., 13 Civ. 03905 (LGS) (FM)**

Dear Judge Maas:

This firm is co-counsel to Felix Sater, defendant in the above-captioned proceeding. We submit this letter in opposition to the request by Frederic Oberlander's "recently retained" counsel, Simon Miller of Blank Rome LLP, for an additional two weeks to make a written submission objecting to Your Honor's order directing that the purloined "Bayrock" documents be turned over to the court and that no copies be retained under any circumstances.

Making last minute requests to extend court imposed deadlines has been part of a routine practice and strategy by Mr. Oberlander to continually delay these proceedings. Indeed the eleventh hour requests made in these cases are far too numerous to count. The court should note that Blank Rome LLP's potential representation of Mr. Oberlander is not at all "recent". As far back as October, 24, 2014, a partner of Mr. Miller's from Blank Rome attended, at Mr. Oberlander's request, the Civil Contempt proceedings pending against Oberlander before the Hon. Brian Cogan in the Eastern District of New York.

As co-counsel indicated in the April 16th proceedings before this court, Judge Schofield has noted "the vexatious defiance of court orders" which has forced the defendants to litigate for five years as a result of the purloined "Bayrock" documents being in the complaint. Extending professional courtesy to counsel is not appropriate when a party uses that "recently retained" counsel as a pawn to facilitate their improper objective to continuously keep otherwise frivolous litigation pending against, and to the extreme prejudice of, our client.

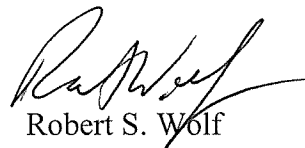


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Accordingly, we request that Mr. Oberlander's request for additional time to comply with the court's order be denied.

Thank you for your attention to this matter.

Respectfully,



Robert S. Wolf

cc: Michael Beys, Esq.
Walter Saurack, Esq.
Bradley Simon, Esq.
Simon Miller, Esq.